

NOW INTO COURT, through undersigned counsel, comes ACE American Insurance Company (“ACE”), which respectfully requests an extension of time to reply to Rippy Oil Company’s (“Rippy Oil”) Response in Opposition to Defendant’s Motion to Dismiss, or in the Alternative, Transfer or Stay filed on March 23, 2022. In support, ACE would show the Court as follows:

Rippy Oil filed its Response in Opposition to Defendant’s Motion to Dismiss, or in the Alternative, Transfer or Stay¹ on March 23, 2022.

The 7-day deadline in which to respond to Ripsey Oil's Response in Opposition falls on March 30, 2022. *See* Fed. Rule Civ. Pro. 27(a)(4).

¹ See R. Doc. 23.

3.

ACE requests a thirty (30) day extension of time, up to and including April 29, 2022, in which to reply to Rippy Oil's Response in Opposition.

4.

Counsel for Rippy Oil has been contacted and they have no opposition to the extension of time requested by ACE herein. All other counsel-of-record have also been contacted and do not oppose this Motion.

5.

There is good cause for the extension of time. Lead counsel for ACE is tending to a family emergency, which first arose on March 25, 2022. Additionally, counsel for ACE's law firm is actively in the process of relocating to a new office space, hindering counsel's access to all relevant file materials.

6.

The brief extension requested will not interfere with or otherwise impact the May 26, 2022, Initial Pretrial and Scheduling Conference.²

WHEREFORE, PREMISES CONSIDERED, ACE respectfully requests that this Honorable Court enter an order granting it a thirty (30) day extension of time, up to and including April 29, 2022, to file its reply to Response in Opposition to Defendant's Motion to Dismiss, or in the Alternative, Transfer or Stay, and for such further relief to which this Court finds ACE as justly entitled to.

[Signature on Following Page]

² See R. Doc. 5.

Respectfully submitted,

BROWN SIMS, PC

BY: /s/ Thear J. Lemoine

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**Attorneys for ACE American Insurance
Company**

CERTIFICATE OF CONFERENCE

I certify that counsel for ACE American Insurance have conferred with all counsel of record, who have indicated they have no opposition to this Unopposed Motion for Extension of Time to File Responsive Pleadings.

/s/ Thear J. Lemoine

Thear J. Lemoine

CERTIFICATE OF SERVICE

I hereby certify that on this Friday, March 25, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Thear J. Lemoine

Thear J. Lemoine